

RECEIVED

JUN 22 2022 SH

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT
COURT FOR THE NORTHERN
DISTRICT OF ILLINOIS
EASTERN DIVISION

SHADAY TOWNS

VS

DEPARTMENT OF HUMAN SERVICE, in their individual capacity and official capacity;
MISSOURI DEPARTMENT OF HUMAN SERVICE ; KEITH BENAS in his individual capacity
and official capacity.

CIVILNO:

22-CV-3262

Judge Robert W. Gettleman
Judge Sunil Harjani

42 U.S.C Ss 1983 & 42 U.S.C 1985 & 1986

COMES NOW, SHADAY TOWNS in her own proper persona sui juris and moves this honorable
court as following: 42 U.S.C Ss 1983 & 42 U.S.C 1986 Plaintiff bring this action because
she's a victim of sexual abuse and at the hands of the Chicago Department of Human service,
and the Missouri Department of human service failure to properly investigate the incident's of
minors being sexual abused by my step father.

JURISDICTION

JURISDICTION IS INVESTED IN THIS COURT PURSUANT TO 28 U.S.C. 1331 & 28 U.S.C .
Ss 1334

VENUE

VENUE IS INVESTED IN THIS COURT PURSUANT TO 28 U.S.C. Ss 1391

PLAINTIFF

SHADAY TOWNS CAN BE SERVED AT THE PHYSICAL ADDRESS 2338 LAWS Hill RD

DEFENDANTS

The Department Of Human service can be served at 100 S. Grand Ave , Springfield, IL 62762

Missouri Department of human social service
3101 Chauteau Ave St.Louis, MO 631003

STATEMENT OF CASE


1. IN THE PHYSICAL YEAR OF 2002 , WHEN MY MOTHER AND HER HUSBAND DECIDED TO MOVE OUR FAMILY FROM CHICAGO ILLINOIS TO 199 NORTH CHEYENNE RD., IN NIXA , MO 65714 65714 THEY ABUSE HAD ALREADY STARTED.
2. The Defendant Keith Benas was very abusive physically emotionally and verbally , from the young age of 10 and 11 this individual was raping the plaintiff and it all started in 1998 and I was 6 years old. The plaintiff states the abuse had gotten so bad that my grades had started dropping and my emotions and attitude in class was going from great to worst.
3. In the summer of June 2002 when we went from Chicago to NIXA Missouri I began to actually wake up in the middle of the night to the defendant's abusing me.
4. The first night in. NIXA Missouri I woke up , my clothes were removed , my legs were propped up hand open , he was naked , his fingers were inside of me and he was using his left hand to stroke his penis .
5. The plaintiff didn't understand why her step father was raping and menatilly abusing her and I began to convey information over to my mother and family members and no one believed me.
6. The plaintiff states every night the defendant Keith Benas came into her room to rape her ans so she started wearing two pairs of pants to sleep.
7. But every night the defendant Keith Benas found a way to remove my pants from my waist.
8. The plaintiff states every night at 2:08 or 2:06 the defendant Keith Benas would rape and fondle me.
9. The plaintiff states all the facts came to the attention of the Department of human service in Chicago because I started running away and the system neglected my interview with my social workers because my mother was covering up for my step- father.
10. In May of 2004 , I told my mom and pastors while standing in the nursery of Eagle Heights worship center church about the abuse, with a witness (Elizabeth Stanley) in the room for support because I was scared. My mom hugged me,said everything will be ok. She then took me home, whipped me, made me get on the phone with the pastor and apologize for lying to her about my stepfather.

11. In July of 2004 I then told a aunt in Chicago (Francine Towns) who then called police and child abuse hotline, the police in Chicago said they couldn't help because the abuse wasn't current in Chicago and was never reported in the past and there wasn't a current case or investigation in Missouri and ordered her to release me back to my mother. My mother made me lie to police in Missouri saying the abuse never happen in 2007, a officer dispatched to the house about an altercation between my siblings, and my step father, the officer realize I was the child sexual abuse involving Keith and removed me from the home .
12. The plaintiff was placed in the Missouri Department of Human services and was moved to multiple households who were strangers and then placed in the Boys and Girls Town of Springfield until January 26, 2009 then, Brandi and Rachel (caseworkers) released me back into my mother's custody.
13. During the 2 years I was in the custody of the Missouri Department of Human services I was free from sexual abuse and harassment from my step father Keith Benas.
14. The two social workers Ms. Brandi and Ms. Rachel was told about my violation of my person as a child in the house with a sexual predator Keith Benas.
15. The plaintiff states the whole time I was in Missouri Boy and Town of Springfield Missouri I wasn't ever given any counseling or therapy for the 2 years under care of the state of Missouri .
16. In January of 2009 when I was released back to my mother we were given recommendations for therapy sessions at the Burrell bureau counseling center in Springfield Missouri.
17. The plaintiff states after I seen the system had failed me my mother and family I ran away from the sexual abuse of Keith Benas.
18. The plaintiff called the state Attorney office in NIXA Missouri in the physical year of 2013 & 2014 to inquire about my case that was sitting on the state's attorney desk I was giving the runaround.
19. The plaintiff ask the state why hadn't no one pickup the case for Sexual Assault , Rape and Molestation.
20. The plaintiff was told the Nixa police Department sent over evidence 2-3 times and the prosecutor and the prosecutor at the time denied the charges .
21. After calling the prosecutor office a third time the prosecutor said she knew who I was and would investigate more and call me back .
22. The prosecutor's name was Lisa. The plaintiff was able to retrieve over 300 pages of physical copies of records from my case.
23. The plaintiff states today she suffers from depression, anxiety, sleep disorder , eating disorder, night terrors , PTSD, from each incident of being rape.
24. During the time of these incidents the plaintiff was a minor and couldn't invoke the jurisdiction over the court with a parent's authority.
25. This court has jurisdiction over this case pursuant to 28 U.S.C. 1331 & 1334,

RELIEF SOUGHT

1. Seeking declaratory relief for ILLINOIS Department of human services and the Missouri Department of human services to bring their policies up to constitutional standards to stop child abuse .
2. Mental Anguish
3. Compensatory damages
4. Punitive damages
5. Seeking counsel under the trial bar obligations
6. Any other relief this court deems just and fair .

RESPECTFULLY SUBMITTED



6/21/